

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

CARRIE CONLEY, LOCKHART WEBB,
and ELLA KROMM, individually and on
behalf of all others similarly situated;
GABRIELA ADLER-ESPINO; and THE
LEAGUE OF WOMEN VOTERS OF
NORTH CAROLINA,

Plaintiffs,

v.

ALAN HIRSCH, JEFF CARMON, STACY
“FOUR” EGGERS IV, KEVIN N. LEWIS,
and SIOBHAN O’DUFFY MILLEN, in their
official capacities as members of the North
Carolina State Board of Elections; and
KAREN BRINSON BELL, in her official
capacity as Executive Director of the North
Carolina State Board of Elections,

Defendants.

Case No. 5:25-cv-00193-M

**PLAINTIFFS’ MOTION FOR A
TEMPORARY RESTRAINING ORDER
AND/OR PRELIMINARY INJUNCTION**

**EMERGENCY HEARING AND ORAL
ARGUMENT REQUESTED**

Pursuant to Federal Rule of Civil Procedure 65, and for the reasons set forth in the accompanying Memorandum, Plaintiffs Carrie Conley, Lockhart Webb, Ella Kromm, Gabriela Adler-Espino, and the League of Women Voters of North Carolina (collectively, “Plaintiffs”) hereby move this Court for emergency interim relief, as set forth below and in the accompanying Proposed Order: (1) Defendants and their agents are enjoined from retroactively applying the post-election changes in election procedures to the 2024 Seat Six election to presumptively invalidate, discard, encumber, or otherwise not count the votes cast by Plaintiffs and all other members of the proposed Class in that election; (2) Defendants and their agents are enjoined from requiring Plaintiffs and all other members of the proposed Class to provide additional “verification” that

their votes were lawful in order for those votes to be counted in the 2024 Seat Six election, and issue related declaratory relief; and (3) Defendants and their agents are enjoined from certifying Jefferson Griffin as the winner of the 2024 Seat Six election.

Plaintiffs conferred with Defendants regarding their intent to seek the requested relief prior to the filing of this Motion. Defendants have not provided a position on whether the requested relief is warranted.

Wherefore, for the reasons set forth in the accompanying Memorandum, Plaintiffs respectfully request that the Court grant this Motion.

Dated: April 14, 2025

Respectfully Submitted,

/s/ Jessica A. Marsden

Jessica A. Marsden

Jessica A. Marsden
Protect Democracy Project
510 Meadowmont Village Circle, No. 328
Chapel Hill, NC 27517
jess.marsden@protectdemocracy.org
Telephone: (202) 579-4582
Fax: (202) 769-3176
State Bar No. 50855

Anne Harden Tindall
Protect Democracy Project
510 Meadowmont Village Circle, No. 328
Chapel Hill, NC 27517
anne.tindall@protectdemocracy.org
Telephone: (202) 579-4582
Fax: (202) 769-3176
State Bar No. 31569

Samuel Jacob Davis
Election Law Clinic at Harvard Law School
6 Everett Street,
Cambridge, MA, 02138
Telephone: (631) 807-2327
State Bar No. 57289

Hayden Johnson*
Protect Democracy Project
2020 Pennsylvania Avenue NW, Suite #163
Washington, DC 20006
hayden.johnson@protectdemocracy.org
Telephone: (202) 579-4582
Fax: (202) 769-3176

John Paredes*
Protect Democracy Project
82 Nassau Street, #601
New York, NY 10038
john.paredes@protectdemocracy.org
Telephone: (202) 579-4582
Fax: (202) 769-3176

Stacey Leyton*
Danielle Leonard*
Juhyung Harold Lee*
Altshuler Berzon LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Fax: (415) 362-8064
sleyton@altber.com
dleonard@altber.com
hlee@altber.com

**Notice of special appearance forthcoming*